

UNITED STATES DISTRICT OF COURT  
DISTRICT OF MAINE  
Docket no.

Roy Youn,  
Plaintiff

v.

Ernest Butler,  
Defendant

**COMPLAINT**  
**AND DEMAND FOR JURY TRIAL**

Plaintiff Roy Youn, by and through counsel, states the following as his Complaint against Defendant Ernest Butler:

1. Plaintiff Roy Youn is an individual who resides at 33 Pond Avenue, Brookline, Norfolk County, Massachusetts.
2. Defendant Ernest Butler is an individual who is believed to reside at 221 Eastside Road, Hancock, Hancock County, Maine.
3. This Court has jurisdiction pursuant to 28 U.S.C. § 1332 because the parties are citizens of different states and the amount in controversy is more than \$75,000.
4. On August 1, 2021, Plaintiff Roy Youn was operating his motor vehicle on State Street in Ellsworth, Maine, near the intersection with Lakes Lane. Robert Drive in Easton, Massachusetts.
5. At the same time and place, Defendant Ernest Butler was operating a motor vehicle on State Street in Ellsworth, Maine, near the intersection with Lakes Lane, and was behind the vehicle operated by the Plaintiff.
6. Defendant Ernest Butler negligently failed to observe the traffic and road conditions in front of him.

7. Defendant Ernest Butler negligently failed to maintain control of his vehicle.
8. Defendant Ernest Butler negligently failed to operate her motor vehicle in a safe manner.
9. Defendant Ernest Butler negligently caused the front end of his vehicle to crash into the rear end of Plaintiff's vehicle, in turn causing Plaintiff's vehicle to collide with the vehicle in front of it.
10. The crash and impact caused the Plaintiff Roy Youn to be injured.
11. The crash was proximately caused by the Defendant Ernest Butler's careless and negligent operation of his motor vehicle.
12. As a direct and proximate result of the negligence of the Defendant Ernest Butler, Plaintiff Roy Youn sustained personal injuries, incurred medical bills and suffered other damages.

WHEREFORE, Plaintiff Roy Youn demands judgment against the Defendant Ernest Butler in an amount not yet ascertained plus interest and costs of this action.

**DEMAND FOR JURY TRIAL**

The Plaintiff demands a jury resolution of all issues so triable.

Plaintiff Roy Youn,  
By his attorneys,

*/s/ Paul R. Johnson*

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